

DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION
RCRA Corrective Action
Environmental Indicator (EI) RCRIS code (CA725)
Current Human Exposures Under Control

Facility Name: Superior Tube Company
Facility Address: 3900 Germantown Pike, Evansburg, PA 19426
Facility EPA ID #: PAD 00 235 3407

1. Has **all** available relevant/significant information on known and reasonably suspected releases to soil, groundwater, surface water/sediments, and air, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been **considered** in this EI determination?

 X If yes - check here and continue with #2 below.
 If no - re-evaluate existing data, or
 if data are not available skip to #6 and enter "IN" (more information needed) status code.

BACKGROUND

Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

Definition of "Current Human Exposures Under Control" EI

A positive "Current Human Exposures Under Control" EI determination ("YE" status code) indicates that there are no "unacceptable" human exposures to "contamination" (i.e., contaminants in concentrations in excess of appropriate risk-based levels) that can be reasonably expected under current land- and groundwater-use conditions (for all "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRA). The "Current Human Exposures Under Control" EI are for reasonably expected human exposures under current land- and groundwater-use conditions ONLY, and do not consider potential future land- or groundwater-use conditions or ecological receptors. The RCRA Corrective Action program's overall mission to protect human health and the environment requires that Final remedies address these issues (i.e., potential future human exposure scenarios, future land and groundwater uses, and ecological receptors).

Duration / Applicability of EI Determinations

EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

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2. Are groundwater, soil, surface water, sediments, or air **media** known or reasonably suspected to be **“contaminated”**¹ above appropriately protective risk-based “levels” (applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action (from SWMUs, RUs or AOCs)?

	<u>Yes</u>	<u>No</u>	<u>?</u>	<u>Rationale / Key Contaminants</u>
Groundwater	x			Ongoing groundwater remediation.
Air (indoors) ²		x		Meet OSHA requirements
Surface Soil (e.g., <2 ft)		x		Contaminated soil excavated
Surface Water		x		No record of contamination
Sediment		x		Contaminated sediment excavated
Subsurf. Soil (e.g., >2 ft)		x		Contaminated soil excavated
Air (outdoors)		x		Emission controls in place

—— If no (for all media) - skip to #6, and enter “YE,” status code after providing or citing appropriate “levels,” and referencing sufficient supporting documentation demonstrating that these “levels” are not exceeded.

X If yes (for any media) - continue after identifying key contaminants in each “contaminated” medium, citing appropriate “levels” (or provide an explanation for the determination that the medium could pose an unacceptable risk), and referencing supporting documentation.

—— If unknown (for any media) - skip to #6 and enter “IN” status code.

Rationale and Reference(s):

General Info.: On December 28, 1998, STC agreed to implement remediation pursuant to the Corrective Measures Implementation Consent Order. The remediation consists of soil excavation, groundwater pump and treat, in-situ soil vapor extraction, and closures of solid wastes management units. STC has implemented the remediation and will continue to conduct groundwater and soil vapor extraction monitoring to ensure that remediation systems are in proper order.

Groundwater: As part of the ongoing remediation, Superior Tube Company (STC) will continue to monitor and remediate the groundwater plume, which consists predominately of trichloroethylene (TCE). TCE detections in groundwater range from 0.9-50 mg/L. (*2001 Annual Groundwater Report*)

Surface and Subsurface Soil: Contaminated soils have been excavated and disposed off-site. The excavated areas were backfilled and the areas were either re-seeded or paved over. (*Corrective Measures Implementation Report, 2002*)

Air (outdoors): Air emission equipment are in place to minimize volatile organic compounds (VOCs) emissions from the facility manufacturing operations. (*Corrective Measures Implementation Report, 2002*)

Air (indoors): The facility uses numerous VOCs, especially TCE as part of their manufacturing process. As part of the OSHA’s requirement for the manufacturing buildings, the facility installed monitor and ventilation systems to ensure that indoor VOC levels do not exceed human health threshold levels. (*RCRA Facility Investigation Report*)

Sediment: Under the Corrective Measures Implementation Consent Order, contaminated sediment near the facility outfalls was excavated and disposed off-site. (*Corrective Measures Implementation Report, 2002*)

Surface water: No record of contamination. The facility is in compliance with the National Pollutant Discharge Elimination System (NPDES) at the facility’s outfalls. The groundwater plume is limited to subterranean boundaries and does not discharge to the nearby creek. (*Corrective Measures Implementation Report, 2002*)

Footnotes:

1 “Contamination” and “contaminated” describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriately protective risk-based “levels” (for the media, that identify risks within the acceptable risk range).

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²Recent evidence (from the Colorado Dept. of Public Health and Environment, and others) suggest that unacceptable indoor air concentrations are more common in structures above groundwater with volatile contaminants than previously believed. This is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration necessary to be reasonably certain that indoor air (in structures located above (and adjacent to) groundwater with volatile contaminants) does not present unacceptable risks.

3. Are there **complete pathways** between “contamination” and human receptors such that exposures can be reasonably expected under the current (land- and groundwater-use) conditions?

Summary Exposure Pathway Evaluation Table

<u>“Contaminated” Media</u>	Potential <u>Human Receptors</u> (Under Current Conditions)						
	Residents	Workers	Day-Care	Construction	Trespassers	Recreation	Food ³
Groundwater	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>		<u>No</u>	
Air (indoors)	___	___	___				
Soil (surface, e.g., <2 ft)	___	___	___	___	___	___	___
Surface Water	___	___			___	___	___
Sediment	___	___			___	___	___
Soil (subsurface e.g., >2 ft)				___			___
Air (outdoors)	___	___	___	___	___		

Instructions for Summary Exposure Pathway Evaluation Table:

1. Strike-out specific Media including Human Receptors' spaces for Media which are not “contaminated” as identified in #2 above.
2. enter “yes” or “no” for potential “completeness” under each “Contaminated” Media -- Human Receptor combination (Pathway).

Note: In order to focus the evaluation to the most probable combinations some potential “Contaminated” Media - Human Receptor combinations (Pathways) do not have check spaces (“___”). While these combinations may not be probable in most situations they may be possible in some settings and should be added as necessary.

- X If no (pathways are not complete for any contaminated media-receptor combination) - skip to #6, and enter “YE” status code, after explaining and/or referencing condition(s) in-place, whether natural or man-made, preventing a complete exposure pathway from each contaminated medium (e.g., use optional Pathway Evaluation Work Sheet to analyze major pathways).
- _____ If yes (pathways are complete for any “Contaminated” Media - Human Receptor combination) - continue after providing supporting explanation.
- _____ If unknown (for any “Contaminated” Media - Human Receptor combination) - skip to #6 and enter “IN” status code.

Rationale and Reference(s): Pursuant to the 1998 Corrective Measures Implementation Consent Order, STC implements semi-annual groundwater monitoring and continuous groundwater remediation at the site. Offsite residents who are impacted by the groundwater plume have been identified and were either connected to public water or a dual carbon filtration system was installed in the homes to treat the groundwater. With regards to the onsite groundwater plume, the facility has a treatment system in place to remediate the groundwater. Potential onsite and offsite human exposures are under control. (*Corrective Measures Implementation Report, 2002*)

³ Indirect Pathway/Receptor (e.g., vegetables, fruits, crops, meat and dairy products, fish, shellfish, etc.)

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4. Can the **exposures** from any of the complete pathways identified in #3 be reasonably expected to be **“significant”**⁴ (i.e., potentially “unacceptable” because exposures can be reasonably expected to be: 1) greater in magnitude (intensity, frequency and/or duration) than assumed in the derivation of the acceptable “levels” (used to identify the “contamination”); or 2) the combination of exposure magnitude (perhaps even though low) and contaminant concentrations (which may be substantially above the acceptable “levels”) could result in greater than acceptable risks)?

_____ If no (exposures can not be reasonably expected to be significant (i.e., potentially “unacceptable”) for any complete exposure pathway) - skip to #6 and enter “YE” status code after explaining and/or referencing documentation justifying why the exposures (from each of the complete pathways) to “contamination” (identified in #3) are not expected to be “significant.”

_____ If yes (exposures could be reasonably expected to be “significant” (i.e., potentially “unacceptable”) for any complete exposure pathway) - continue after providing a description (of each potentially “unacceptable” exposure pathway) and explaining and/or referencing documentation justifying why the exposures (from each of the remaining complete pathways) to “contamination” (identified in #3) are not expected to be “significant.”

_____ If unknown (for any complete pathway) - skip to #6 and enter “IN” status code

Rationale and Reference(s): _____

⁴ If there is any question on whether the identified exposures are “significant” (i.e., potentially “unacceptable”) consult a human health Risk Assessment specialist with appropriate education, training and experience.

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5. Can the “significant” **exposures** (identified in #4) be shown to be within **acceptable** limits?

_____ If yes (all “significant” exposures have been shown to be within acceptable limits) - continue and enter “YE” after summarizing and referencing documentation justifying why all “significant” exposures to “contamination” are within acceptable limits (e.g., a site-specific Human Health Risk Assessment).

_____ If no (there are current exposures that can be reasonably expected to be “unacceptable”)- continue and enter “NO” status code after providing a description of each potentially “unacceptable” exposure.

_____ If unknown (for any potentially “unacceptable” exposure) - continue and enter “IN” status code

Rationale and Reference(s): _____

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6. Check the appropriate RCRIS status codes for the Current Human Exposures Under Control EI event code (CA725), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (and attach appropriate supporting documentation as well as a map of the facility):

 X YE - Yes, "Current Human Exposures Under Control" has been verified. Based on a review of the information contained in this EI Determination, "Current Human Exposures" are expected to be "Under Control" at the **Superior Tube Company** facility, EPA ID # **PAD 00 235 3407**, located at **3900 Germantown Pike, Evansburg, PA 19426** under current and reasonably expected conditions. This determination will be re-evaluated when the Agency/State becomes aware of significant changes at the facility.

 NO - "Current Human Exposures" are NOT "Under Control."

 IN - More information is needed to make a determination.

Completed by	(signature) _____	Date <u>07/02/02</u>
	(print) <u>Khai M. Dao</u>	
	(title) <u>Remedial Project Manager</u>	

Supervisor	(signature) _____	Date <u>07/02/02</u>
	(print) <u>Paul Gotthold</u>	
	(title) <u>PA Operations Branch Chief</u>	
	(EPA Region or State) <u>EPA, Region 3</u>	

Locations where References may be found:

US EPA
Region III
Waste and Chemical Mgt. Division
1650 Arch Street
Philadelphia, PA 19103

Contact telephone and e-mail numbers:

(name)	<u>Khai M. Dao</u>
(phone #)	<u>(215) 814-5467</u>
(e-mail)	<u>dao.khai@epa.gov</u>

FINAL NOTE: THE HUMAN EXPOSURES EI IS A QUALITATIVE SCREENING OF EXPOSURES AND THE DETERMINATIONS WITHIN THIS DOCUMENT SHOULD NOT BE USED AS THE SOLE BASIS FOR RESTRICTING THE SCOPE OF MORE DETAILED (E.G., SITE-SPECIFIC) ASSESSMENTS OF RISK